

REMARKS

Claims 1-24 are pending in this application. Claims 1, 8, 9, 15, 21, 22, 23 and 24 are amended herein. Support for the amendments to the claims may be found in the claims as originally filed. Claims 3, 10, and 16 are cancelled herein without prejudice or disclaimer. Reconsideration is requested based on the foregoing amendment and the following remarks.

Response to Arguments:

The Applicants acknowledge with appreciation the consideration of their arguments. Further consideration is requested respectfully.

Claim Rejections - 35 U.S.C. § 102:

Claim 24 was rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 6,449,657 to Stanbach, Jr. et al. (hereinafter "Stanbach"). The rejection is traversed.

The second clause of claim 24 recites:

Inputting preference trends of a providing target.

Stanbach neither teaches, discloses, nor suggests "inputting preference trends of an providing target," as recited in claim 24. Stanbach, rather, relies on the *demographic* groups to which a person belongs, i.e. their zip code, state, city, income, age, or sex (as shown in Table 1, at column 12, line 32) to target advertisements associated with emails.

Knowledge of a person's demographics, such as their age or sex, is not equivalent to knowledge of their preference trends. A person may, for example, belong to several different, overlapping demographics, the members of each of which having unique preference trends. Since Stanbach relies on the demographic groups to which a person belongs to target advertisements associated with emails, Stanbach has no use for "inputting preference trends of an providing target," as recited in claim 24.

The third clause of claim 24 recites:

Selecting an advertisement to fit the preference trends of said providing target.

Stanbach neither teaches, discloses, nor suggests, "selecting an advertisement to fit the preference trends of said providing target," as recited in claim 24. Stanbach, rather, selects a set of advertisements matching the *demographic* profile of the intended recipient. In particular, as described at column 9, lines 62-66:

A demographic profile of the intended recipient is generated (or selected, as the

information already exists). Next, a set of advertisements matching the demographic profile of the intended recipient is selected from a table of advertisements.

Since Stanbach is selecting advertisements based on the demographic profile of the intended recipient, Stanbach is not "inputting preference trends of an providing target," as recited in claim 24.

Stanbach, furthermore, queries *demographic* information pertaining to the intended recipient 720 to select the demographic profile snapshot best matching the intended recipient 720 when selecting an advertisement. In particular, as described at column 12, lines 43-50:

When selecting an advertisement, demographic information pertaining to the intended recipient 720 is queried to select the demographic profile snapshot best matching the intended recipient 720. If, for example, the intended recipient 720 matches a "west coast yuppie" profile, then the *daily_ads_west_coast_yuppie* snapshot can be queried for advertisements directed towards the intended recipient's more specific demographic profile.

Since, in Stanbach, demographic information pertaining to the intended recipient 720 is queried to select the demographic profile snapshot best matching the intended recipient 720 when selecting an advertisement, Stanbach is not "selecting an advertisement to fit the preference trends of said providing target," as recited in claim 24.

Furthermore, in Stanbach, advertisements are selected to match demographics such as a target age range of 22 through 30, or a target income of greater than \$50,000, not preference trends. In particular, as described at column 12, lines 51-55:

For example, perhaps only female west coast yuppies are the target audience, the target age range is 22 through 30, and the target income is greater than \$50,000. The *daily_ads_west_coast_yuppie* snapshot is then queried for advertisements matching the target criteria.

Since, in Stanbach, advertisements are selected to match demographics such as a target age or a target income, Stanbach is not "selecting an advertisement to fit the preference trends of said providing target," as recited in claim 24. Claim 24 is thus submitted to be allowable. Withdrawal of the rejection of claim 24 is earnestly solicited.

Claim Rejections - 35 U.S.C. § 103:

Claims 1-23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Sugimoto *et al.* JP 11-242714 (hereinafter "Sugimoto") in view of Stanbach. The rejection is traversed to the extent it might apply to the claims as amended. Reconsideration is earnestly solicited.

In the claimed invention, in contrast to both Sugimoto and Stanbach, a prospective providing target is determined preliminarily by the advertisement provider for presentation to the card-sending client, upon selection of suitable advertising information. The card-sending client, then, is presented with or indicated a plurality of advertising information which might be appropriate and selects one of them to forward to the providing target. Thus, the card-sending client finally selects one of the advertisements from the plurality of advertising information, which has been adapted to the providing target assumed by the advertisement provider. Several examples of providing targets are described in the last paragraph at page 10 of the specification.

Thus, in the claimed invention, an advertisement provider can provide the advertisements to a targeted market. Furthermore, the providing target has an improved opportunity to be sent information which is suitable for their preferences. In Sugimoto, in contrast, no providing target is specified for the selection of the advertisement information.

The sixth clause of claim 1, in particular, recites:

Wherein the providing target has been preliminarily determined by the advertisement provider upon selection of the advertisement information.

Neither Sugimoto nor Stanbach teach, disclose, or suggest, "wherein the providing target has been preliminarily determined by the advertisement provider upon selection of the advertisement information," as recited in claim 1. No *providing* target is mentioned in either Sugimoto or Stanbach at all.

The seventh clause of claim 1 recites:

Wherein the plurality of advertisement information is selected so as to be suitable for the preference trends of the providing target for the selection.

Neither Sugimoto nor Stanbach teach, disclose, or suggest, "wherein the plurality of advertisement information is selected so as to be suitable for the preference trends of the providing target for the selection," as recited in claim 1.

The ninth clause of claim 1 recites:

Selecting a plurality of advertisement information suitable for the preference trends of the providing target input by said first preference trend input means, and displaying a plurality of advertisement information selected for a card sending client.

Neither Sugimoto nor Stanbach teach, disclose, or suggest, "selecting a plurality of advertisement information suitable for the preference trends of the providing target input by said first preference trend input means, and displaying a plurality of advertisement information

selected for a card sending client,” as recited in claim 1. Sugimoto, rather, pays no attention to what the preference trends of the providing target might be at all, let alone selects advertising information based upon them. In particular, as Sugimoto describes the Problem to be Solved:

To enable a new type of advertisement, which is called solicited and, by sending a receiver an electronic greeting card and automatically inputting both a sender and the receiver to lottery about a free gift selected by the sender.

Thus, in Sugimoto a free gift is selected by the *sender*, not “selecting advertisement information suitable for the preference trends of the providing target,” as recited in claim 1. There may be no correlation at all between what the sender thinks the providing target might like and the actual preferences of the providing target.

Furthermore, as Sugimoto describes the Solution:

Since a sender generates an electronic greeting card, sends it and selects a free gift that can be acquired by the sender and his receiver as a team, one among plural 'courses' corresponding to each advertisement company can be picked up (S302).

Thus, in Sugimoto, the *sender* selects the free gift, not “selecting advertisement information suitable for the preference trends of the providing target,” as recited in claim 1. There may be no correlation at all between what the sender thinks the providing target might like and the actual preferences of the providing target.

Furthermore, as Sugimoto also describes in the Solution:

The sender selects a free gift (S304).

Thus, in Sugimoto, the *sender* selects the free gift, not “selecting advertisement information suitable for the preference trends of the providing target,” as recited in claim 1. There may be no correlation at all between what the sender thinks the providing target might like and the actual preferences of the providing target.

Furthermore, as Sugimoto also describes in the Solution:

The free gift can or can not be acquired by the sender and the receiver as the team.

Thus, in Sugimoto, since the free gift might be acquired by both the sender and the receiver, as the team, the sender's personal gift preferences will surely take precedence over whatever the sender might think the receiver might like with respect to the nature of the gift. This is to be contrasted with claim 1, which recites, “selecting advertisement information suitable for the preference trends of the providing target.”

Finally, as Sugimoto also describes in the Solution:

The sender is requested to fill out a questionnaire before sending a 1st greeting card of a specific course in the process of generating an electronic greeting card (S306).

Since, in Sugimoto, the sender is filling out the questionnaire, Sugimoto is not, "selecting advertisement information suitable for the preference trends of the providing target," as recited in claim 1.

Stanbach, for its part, relies on the demographic groups to which a person belongs to target advertisements associated with emails, not preference trends, as discussed above with respect to the rejection of claim 24. Thus, even if Sugimoto and Stanbach were combined, as proposed in the Office Action, the claimed invention would not result.

The tenth clause of claim 1 recites:

Making said card sending client select one piece of advertisement information from amongst the plurality of advertisement information displayed by said advertisement information display means.

Neither Sugimoto nor Stanbach teach, disclose, or suggest, "making said card sending client select one piece of advertisement information from amongst the plurality of advertisement information displayed by said advertisement information display means," as recited in claim 1. Claim 1 is submitted to be allowable. Withdrawal of the rejection of claim 1 is earnestly solicited.

Claims 2-7 depend from claim 1 and add further distinguishing elements. Claims 2-7 are thus also submitted to be allowable. Withdrawal of the rejection of claims 2-7 is also earnestly solicited.

Claims 8:

The sixth clause of claim 8 recites:

Wherein the providing target has been preliminarily determined by the advertisement provider upon selection of the advertisement information.

Sugimoto neither teaches, discloses, nor suggests, "wherein the providing target has been preliminarily determined by the advertisement provider upon selection of the advertisement information," as discussed above with respect to the rejection of claim 1.

The seventh clause of claim 8 recites:

Wherein the plurality of advertisement information is selected so as to be suitable for the preference trends of the providing target for the selection.

Sugimoto neither teaches, discloses, nor suggests, "wherein the plurality of advertisement information is selected so as to be suitable for the preference trends of the providing target for the selection," as discussed above with respect to the rejection of claim 1.

The ninth clause of claim 8 recites:

Selecting a plurality of advertisement information suitable for the preference trends of the providing target input by said first preference trend input means, and displaying a plurality of advertisement information selected for a card sending client.

Sugimoto neither teaches, discloses, nor suggests, "selecting a plurality of advertisement information suitable for the preference trends of the providing target input by said first preference trend input means, and displaying a plurality of advertisement information selected for a card sending client," as discussed above with respect to the rejection of claim 1.

The tenth clause of claim 8 recites:

Making said card sending client select one piece of advertisement information from amongst the plurality of advertisement information displayed by said advertisement information display means.

Sugimoto neither teaches, discloses, nor suggests, "making said card sending client select one piece of advertisement information from amongst the plurality of advertisement information displayed by said advertisement information display means," as discussed above with respect to the rejection of claim 1.

Claim 8 is submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 8 is earnestly solicited.

Claims 9-14:

The eleventh clause of claim 9 recites:

Wherein the providing target has been preliminarily determined by the advertisement provider upon selection of the advertisement information.

Sugimoto neither teaches, discloses, nor suggests, "wherein the providing target has been preliminarily determined by the advertisement provider upon selection of the advertisement information," as discussed above with respect to the rejection of claim 1.

The twelfth clause of claim 9 recites:

Wherein the plurality of advertisement information is selected so as to be suitable for the preference trends of the providing target for the selection.

Sugimoto neither teaches, discloses, nor suggests, "wherein the plurality of advertisement information is selected so as to be suitable for the preference trends of the providing target for the selection," as discussed above with respect to the rejection of claim 1.

The thirteenth clause of claim 9 recites:

Wherein said advertisement information adding step selects a plurality of advertisement information suitable for the input preference trends of the providing target, displays a plurality of advertisement information selected for said card sending client, and makes said card sending client select one piece of advertisement information from amongst the displayed plurality of advertisement information.

Sugimoto neither teaches, discloses, nor suggests "wherein said advertisement information adding step selects a plurality of advertisement information suitable for the input preference trends of the providing target, displays a plurality of advertisement information selected for said card sending client, and makes said card sending client select one piece of advertisement information from amongst the displayed plurality of advertisement information," as discussed above with respect to the rejection of claim 1. Claim 9 is submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 9 is earnestly solicited.

Claims 10-14 depend from claim 9 and add further distinguishing elements. Claims 10-14 are thus also submitted to be allowable. Withdrawal of the rejection of claims 10-14 is also earnestly solicited.

Claims 15-20:

The tenth clause of claim 15 recites:

Wherein the providing target has been preliminarily determined by the advertisement provider upon selection of the advertisement information.

Sugimoto neither teaches, discloses, nor suggests, "wherein the providing target has been preliminarily determined by the advertisement provider upon selection of the advertisement information," as discussed above with respect to the rejection of claim 1.

The eleventh clause of claim 15 recites,

Wherein the plurality of advertisement information is selected so as to be suitable for the preference trends of the providing target for the selection.

Sugimoto neither teaches, discloses, nor suggests, "wherein the plurality of advertisement

information is selected so as to be suitable for the preference trends of the providing target for the selection," as discussed above with respect to the rejection of claim 1.

The twelfth clause of claim 15 recites:

Wherein said first inputting, said first selecting and said adding select a plurality of advertisement information suitable for the input preference trends of the providing target, display a plurality of advertisement information selected for said card sending client, and make said card sending client select one piece of advertisement information from amongst the displayed plurality of advertisement information.

Sugimoto neither teaches, discloses, nor suggests "wherein said first inputting, said first selecting and said adding select a plurality of advertisement information suitable for the input preference trends of the providing target, display a plurality of advertisement information selected for said card sending client, and make said card sending client select one piece of advertisement information from amongst the displayed plurality of advertisement information," as discussed above with respect to the rejection of claim 1. Claim 15 is submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 15 is earnestly solicited.

Claims 16-20 depend from claim 15 and add further distinguishing elements. Claims 16-20 are thus also submitted to be allowable. Withdrawal of the rejection of claims 16-20 is also earnestly solicited.

Claim 21:

The seventh clause of claim 21 recites:

Wherein the providing target has been preliminarily determined by the advertisement provider upon selection of the advertisement information.

Sugimoto neither teaches, discloses, nor suggests, "wherein the providing target has been preliminarily determined by the advertisement provider upon selection of the advertisement information," as discussed above with respect to the rejection of claim 1.

The eighth clause of claim 21 recites:

Wherein the plurality of advertisement information is selected so as to be suitable for the preference trends of the providing target for the selection.

Sugimoto neither teaches, discloses, nor suggests, "wherein the plurality of advertisement information is selected so as to be suitable for the preference trends of the providing target for the selection," as discussed above with respect to the rejection of claim 1.

The tenth clause of claim 21 recites:

Selecting a plurality of advertisement information suitable for the preference trends of the providing target input by said first preference trend input unit, and displaying a plurality of advertisement information selected for a card sending client.

Sugimoto neither teaches, discloses, nor suggests “selecting a plurality of advertisement information suitable for the preference trends of the providing target input by said first preference trend input unit, and displaying a plurality of advertisement information selected for a card sending client,” as discussed above with respect to the rejection of claim 1.

The eleventh clause of claim 21 recites:

Making said card sending client select one piece of advertisement information from amongst the plurality of advertisement information displayed by said advertisement information display unit.

Sugimoto neither teaches, discloses, nor suggests “making said card sending client select one piece of advertisement information from amongst the plurality of advertisement information displayed by said advertisement information display unit,” as discussed above with respect to the rejection of claim 1. Claim 21 is submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 21 is earnestly solicited.

Claim 22:

The tenth clause of claim 22 recites:

Wherein the providing target has been preliminarily determined by the advertisement provider upon selection of the advertisement information.

Sugimoto neither teaches, discloses, nor suggests, “wherein the providing target has been preliminarily determined by the advertisement provider upon selection of the advertisement information,” as discussed above with respect to the rejection of claim 1.

The eleventh clause of claim 22 recites:

Wherein the plurality of advertisement information is selected so as to be suitable for the preference trends of the providing target for the selection.

Sugimoto neither teaches, discloses, nor suggests, “wherein the plurality of advertisement information is selected so as to be suitable for the preference trends of the providing target for the selection,” as discussed above with respect to the rejection of claim 1.

The twelfth clause of claim 22 recites:

Wherein said advertisement information adding step selects a plurality of advertisement information suitable for the input preference trends of the providing target, displays a plurality of advertisement information selected for said card sending client, and makes said card sending client select one piece of advertisement information from amongst the displayed plurality of advertisement information.

Sugimoto neither teaches, discloses, nor suggests “wherein said advertisement information adding step selects a plurality of advertisement information suitable for the input preference trends of the providing target, displays a plurality of advertisement information selected for said card sending client, and makes said card sending client select one piece of advertisement information from amongst the displayed plurality of advertisement information,” as discussed above with respect to the rejection of claim 1. Claim 22 is submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 22 is earnestly solicited.

Claim 23:

The tenth clause of claim 23 recites:

Wherein the providing target has been preliminarily determined by the advertisement provider upon selection of the advertisement information.

Sugimoto neither teaches, discloses, nor suggests, “wherein the providing target has been preliminarily determined by the advertisement provider upon selection of the advertisement information,” as discussed above with respect to the rejection of claim 1.

The eleventh clause of claim 23 recites:

Wherein the plurality of advertisement information is selected so as to be suitable for the preference trends of the providing target for the selection.

Sugimoto neither teaches, discloses, nor suggests, “wherein the plurality of advertisement information is selected so as to be suitable for the preference trends of the providing target for the selection,” as discussed above with respect to the rejection of claim 1.

The twelfth clause of claim 23 recites:

Wherein said first trend program part, said first selection program part and said adding program part select a plurality of advertisement information suitable for the input preference trends of the providing target, display a plurality of advertisement information selected for said card sending client, and make said card sending client select one piece of advertisement information from amongst the displayed plurality of advertisement information.

Sugimoto neither teaches, discloses, nor suggests "wherein said first trend program part, said first selection program part and said adding program part select a plurality of advertisement information suitable for the input preference trends of the providing target, display a plurality of advertisement information selected for said card sending client, and make said card sending client select one piece of advertisement information from amongst the displayed plurality of advertisement information," as discussed above with respect to the rejection of claim 1. Claim 23 is submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 23 is earnestly solicited.

Conclusion:

Accordingly, in view of the reasons given above, it is submitted that all of claims 1-24 are allowable over the cited references. If there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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